

From: Carlin, Jayne [Carlin.Jayne@epa.gov]
Sent: Wednesday, September 03, 2014 9:20 AM
To: Turvey, Martha
Cc: YON Donald R; allison.castellan@noaa.gov; Waye, Don; Henning, Alan; Wu, Jennifer
Subject: Two Additional Comments on Oregon's NPS Plan

Hi Martha,

I had concerns regarding a few passages under the CZARA section under Oregon's NPS Plan. I consulted with my CZARA colleagues and below are suggested changes.

Under CZARA Section, I have the following suggestions for changes:

1. CZARA requires states with approved coastal management programs to implement a set of 56 management measures that reduce NPS pollution. The measures are designed to control runoff from six main sources: forestry, agriculture, urban areas, marinas, hydromodification (such as dams or shoreline and stream channel modification), and wetlands and vegetated shorelines, or riparian areas. Where there is information to indicate that these 56 management measures are not sufficient to attain water quality standards, or protect critical coastal waters, states are required to develop and implement additional management measures.

Please revise the highlighted phrase to: "Where there is information to indicate that these 56 management measures are not sufficient to attain water quality standards or protect designated uses, CZARA requires that additional management measures be developed." This language reflects that either EPA/NOAA or the state determine the need for additional MMs.

2. Since 1998, Oregon has received interim approval on all but two of the (g) Guidance management measures and its strategies for meeting other required elements of the program. The state is also being required by EPA and NOAA to adopt and implement additional management measures for forestry due to the number of 303(d) listed stream segments and the presence of endangered salmon and steelhead species within the CNPCP management area.

Please revise the highlighted section to: "The state is also being required by EPA and NOAA to adopt and implement additional management measures for forestry because science indicates that the existing forestry practices are not adequate to protect water quality and designated uses." This language comes from the conditional approval findings and more accurately captures why the state needs to adopt add MMs.

Thanks!

Jayne

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